

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

Anthony MacKay, Arion Robinson,
Aziz Khetani, Doug LaMarca, John
Irvine, Nicolas Urquiza, Patrick Eckert,
Ye Wang, individually and on behalf of
all others similarly situated,

Plaintiffs,

v.

LENOVO (UNITED STATES) INC.,

Defendant.

C.A. No. 20-1149-RGA

**JOINT STIPULATION AND [PROPOSED] ORDER REGARDING FILING OF
OPPOSITION TO MOTION TO DISMISS, REPLY THERETO AND BRIEFING
SCHEDULE**

WHEREAS, Plaintiffs Anthony MacKay, Arion Robinson, Aziz Khetani, Doug LaMarca, John Irvine, Nicolas Urquiza, Patrick Eckert, and Ye Wang, (“Plaintiffs”) filed their Amended Class Action Complaint (“Amended Complaint”) against defendant Lenovo (United States) Inc. (“Defendant”) on April 2, 2021 (D.I. 15) pursuant to the briefing schedule entered by the Court on March 3, 2021 (D.I. 13);

WHEREAS, on April 30, 2021, Defendant filed a motion to dismiss the Amended Complaint (D.I. 16) (the “Motion to Dismiss”) pursuant to the current briefing schedule;

WHEREAS, the Plaintiffs’ opposition to the Defendant’s motion to dismiss is currently due by May 28, 2021;

WHEREAS, the parties have agreed to mediate this case and a companion case captioned *Gisairo et al. v. Lenovo (United States) Inc.*, Civil Action No. 19 -cv-2727 (D. Minn.) on July 1, 2021, before Hon. Jeffrey J. Keyes (ret.);

WHEREAS, the parties wish to focus their efforts on the upcoming July 1, 2021 mediation and ensure that they have adequate time to prepare for the mediation; and

WHEREAS, the parties have met and conferred and agreed on a schedule for the filing of Plaintiffs' Opposition to the Motion to Dismiss (the "Opposition") and Defendant's reply to the Opposition (the "Reply");

NOW THEREFORE, the parties, through their undersigned counsel, hereby agree, stipulate, and respectfully request that the Court enter an Order as follows:

1. In the event that the July 1, 2021 meditation session is unsuccessful, Plaintiffs shall file and serve their Opposition within four (4) weeks of the date that either party advises the other in writing that mediation efforts have concluded unsuccessfully.
2. Defendant shall file and serve its Reply within four (4) weeks of the filing of the Opposition.

Dated: May 27, 2021

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SO ORDERED this _____ day of _____, 2021.

UNITED STATES DISTRICT JUDGE